

TO ALL CHILDREN WHO ARE OR WILL BE IN THE CUSTODY OF MICHIGAN'S DEPARTMENT OF HUMAN SERVICES ("DHS") AND TO THE LEGAL REPRESENTATIVES OF THESE CHILDREN:

This notice concerns the approval of a settlement regarding attorneys' fees and non-taxable expenses relating to the class action lawsuit regarding the foster child care system in the State of Michigan entitled *Dwayne B., et al. v. Granholm, et al., Eastern District of Michigan, Case No. 2:06-CV-13548*. A previous settlement of the claims in this case was approved by the Court on October 24, 2008, after notice and hearing.

The previous settlement provided only injunctive and declaratory relief, and no award of money damages. The Parties to this class action now have reached a proposed settlement of Plaintiffs' claim for recovery of attorneys' fees and non-taxable expenses as the prevailing party in this civil rights action under 42 U.S.C. §1988 in the amount of \$6,200,000.00. The sole purpose of this notice is to inform you of this settlement so that you may decide what to do about it.

YOU HAVE THE RIGHT TO REVIEW THE JOINT MOTION FOR APPROVAL OF SETTLEMENT OF ATTORNEYS' FEES AND NON-TAXABLE EXPENSES IF YOU CHOOSE AND TO TELL THE JUDGE WHAT YOU THINK BEFORE THE JUDGE DECIDES WHETHER TO APPROVE THE SETTLEMENT REGARDING ATTORNEYS' FEES AND NON-TAXABLE EXPENSES PAID TO PLAINTIFFS BY DEFENDANTS.

For a full description of the settlement entered in this case, a copy of the joint motion for approval of the settlement of the attorneys' fees and expenses, and other information about this case, please visit: www.childrensrights.org or www.michigan.gov/dhs. **A Court hearing about this settlement may be held.**

Class members or their legal representatives who have questions about this Notice or any hearing on this settlement may contact Plaintiffs' Attorney Sara Bartosz at Children's Rights' toll-free at (888) 283-2210, or Defendants' Attorney P. Rivka Schochet at 313-496-7636. Please do not call DHS, the Court or the Judge.

Class members or their legal representatives may submit written comments about the settlement of attorneys' fees and non-taxable expenses payable to Plaintiffs, if postmarked **on or before January 9, 2009**. To submit written comments, Class members or their legal representatives must send or deliver a signed letter, including printed name, address and telephone number, addressed to:

Sara M. Bartosz, Esq.
Children's Rights Inc.
330 Seventh Avenue, Fourth Floor
New York, NY 10001

This Notice has been approved for distribution by The Honorable Nancy G. Edmunds, United States District Court Judge,
Eastern District of Michigan.